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BERKMAN_{LLP}

July 11, 2024

The Honorable Judge Arun Subramanian
United States District Court
Southern District of New York
500 Pearl Street, Courtroom 15A
New York, NY 10007

VIA ECF

Re: Go Global Retail, LLC v. Dream on Me, Industries, Inc. et al.
Case No.: 1:23-cv-07987

Dear Judge Subramanian:

This firm represents Plaintiff, Go Global Retail, LLC (“Plaintiff” or “Go Global”) in the above-referenced action. Together with Defendants, Dream on Me Industries, Inc. and Dream on Me, Inc. (collectively “DOM”), we write to request an extension of the deadlines for (1) the completion of discovery from July 16, 2024 to November 1, 2024 and (2) the schedule for post-discovery summary judgment motions from service by July 26, 2024 with answering papers by August 9, 2024 and reply papers by August 16, 2024, to November 15, 2024 with answering papers by December 2, 2024, and reply papers by December 9, 2024.

This is the first request for an extension of these deadlines. We request an extension as the parties have exchanged initial document productions and require additional time to complete document production, including responses to the parties’ Second Requests for Production, and depositions. Both parties consent to this extension. There is no presently scheduled appearance before this Court.

Thank you for your attention and courtesy in this matter. Should the Court require any additional information, we are available at the Court’s convenience.

Very truly yours,
Falcon Rappaport & Berkman LLP

/s/ Jessica M. Moore

By: Moish E. Peltz, Esq.
Steven Berlowitz, Esq.
Jessica M. Moore, Esq.

cc: All Counsel of Record (via ECF only)